

1 Lauren M. Hausman (CA Bar No. 349514)
2 **COPYCAT LEGAL PLLC**
3 113 N San Vicente Blvd
4 Suite 232
5 Beverly Hills, CA 90211
6 T: (877) 437-6228
7 E: lauren@copycatlegal.com

8 Attorney for Plaintiff
9 Michael Grecco Productions, Inc.

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 MICHAEL GRECCO
15 PRODUCTIONS, INC.,

16 Plaintiff,

17 v.

18 TIKTOK, INC.,

19 Defendant.

20 Civil Action No. 2:24-cv-04837-FLA-
21 MAR

22 **NOTICE OF MOTION AND
23 MOTION FOR EXTENSION OF
DEADLINES**

24 **(OPPOSED)**

25 DATE: Wednesday, May 14, 2025

TIME: 11:00 a.m.

JUDGE: Margo A. Rocconi

26 PLEASE TAKE NOTICE that, Plaintiff Michael Grecco Productions, Inc.
27 (“Grecco”) respectfully moves the Court for an order extending the deadlines of
28 this case by sixty (60) days and, in support thereof, states as follows:

- 29 1. On June 7, 2024, Plaintiff filed its Complaint in this action. See D.E.
30

1 2. On August 15, 2024, Plaintiff filed its First Amended Complaint. See
2 D.E. 23.
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4 3. On August 29, 2024, Defendant filed its Motion to Dismiss. See D.E.
5 24.
6

7 4. On October 23, 2024, the Court entered a Scheduling and Trial Order.
8 See D.E. 42.
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10 5. On March 12, 2024, the Court granted Defendant's Motion to Dismiss
11 without prejudice and with leave for Plaintiff to file a Second Amended Complaint.
12 See D.E. 45.
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14 6. On April 1, 2025, Plaintiff filed its Second Amended Complaint. See
15 D.E. 46.
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17 7. On April 29, 2025, Defendant filed its Answer and its Affirmative
18 Defenses to the Second Amended Complaint. See D.E. 46. The Answer asserts
19 eighteen (18) affirmative defenses.
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21 8. As the Court knows, discovery closes May 9, 2025. Accordingly,
22 Plaintiff could not engage in discovery as to Defendant's affirmative defenses until
23 ten (10) days before the close of discovery.
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25 9. Given that Defendant did not identify any of its multitude of purported
bases for avoiding liability on Plaintiff's claims until 10 days before the close of
discovery, Plaintiff will be highly prejudiced if it cannot seek discovery from
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Defendant concerning its defenses, the third parties that may be responsible for uploading the subject photographs, etc.

10. At this juncture, neither party has been able to engage in depositions due to scheduling conflicts and the pleadings being incomplete. To avoid prejudice to both parties, Plaintiff respectfully makes the request that the deadlines in the case be extended to allow both parties more time to sufficiently complete their discovery.

11. Plaintiff hereby requests that the deadlines set forth in the October 23, 2024 Scheduling and Trial Order be extended by sixty (60) days.

12. The requested extension of time is being made in good faith.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order granting the request for extension of deadlines and extending the deadlines sixty (60) days.

LOCAL RULE 7.3 CERTIFICATE

Before filing this Request, undersigned counsel conferred with counsel for Defendant (Connor J. Hansen, Esq.) who indicated that he opposes the requested relief.

Dated: May 5, 2025.

COPYCAT LEGAL PLLC

By: /s/ Lauren M. Hausman

1 Lauren M. Hausman, Esq.
2 Jonathan Alejandrino, Esq. (*pro hac vice*)
3 Attorneys for Plaintiff
4 Michael Grecco Productions, Inc.

5 **CERTIFICATE OF SERVICE**

6 I hereby certify that on May 5, 2025, I electronically filed the foregoing
7 document with the Clerk of the Court using CM/ECF, which will electronically
8 serve all counsel of record.
9

10 /s/ Lauren M. Hausman
11 Lauren M. Hausman, Esq.
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